

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankruptcy 19-21225
)
LAWRENCE E. CRAWFORD,)
)
Debtor.) Chapter 13
)
MORTGAGE ASSETS)
MANAGEMENT, LLC, F/K/A)
REVERSE MORTGAGE)
SOLUTIONS, INC.,)
)
Movant.)
v.)
)
LAWRENCE E. CRAWFORD,)
RONDA J. WINNECOUR,)
)

Respondents.

**RESPONSE OF DEBTOR LAWRENCE E. CRAWFORD TO MOTION OF
MORTGAGE ASSETS MANAGEMENT, LLC F/K/A REVERSE MORTGAGE
SOLUTIONS, INC. FOR RELIEF FROM AUTOMATIC STAY**

And now comes the Respondent, Lawrence E. Crawford, by and through his attorneys Joseph P. Nigro, Esquire and Nigro and Associates, LLC and respectfully represent as follows:

1. Debtor filed a voluntary petition pursuant to Chapter 7 of the United States Bankruptcy Court on March 28, 2019. An order Granting Motion to Convert Case from Chapter 7 to Chapter 13 was granted on July 11, 2019.
2. The Debtor's mother, Gwendolyn Crawford, departed this life on August 9, 2020 while the Debtor was in Chapter 13 Bankruptcy.

3. The Debtor was not an owner listed on the deed for the real property. . He is also aware that his mother, Gwendolyn Crawford, entered into a Reverse Mortgage for her property located at 6920 McPherson Blvd, Pittsburgh, PA 15208 but was under the impression that once his mother passed the bank would retain the property based on the terms of the Reverse Mortgage therefore the Debtor would have no ownership interest in the property.

4. The Debtor will be filing an amended Schedule A which will include any potential ownership interest if any in the property located at 6920 McPherson Blvd, Pittsburgh, PA 15208.

5. The Debtor will be filing an amended Chapter 13 Plan Section 3.5 stating that he is surrendering all ownership interest if any exist in the property located at 6920 McPherson Blvd, Pittsburgh, PA 15208.

WHEREFORE, Respondent, Lawrence E. Crawford, respectfully requests that this Court enter an Order denying the Motion of Mortgage Assets Management, LLC F/K/A Reverse Mortgage Solutions, Inc. for Relief from Automatic Stay.

Respectfully submitted,

03/09/2023
Date

/s/ Joseph P. Nigro
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